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February 15, 2012

Commission Secretary  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: Request For Consideration of Legal Question by Commission Pursuant to  
Notice 2011-11**

Dear Commission Secretary,

The following request for consideration of a legal question by the Commission is submitted by the undersigned counsel on behalf of Michael Williams For U.S. Senate Committee (the "Committee"),<sup>1</sup> pursuant to the Commission's Policy Statement designated as Notice 2011-11.

On February 9, 2012, Ms. Nataliya Ioffe of the Reports Analysis Division contacted Thomas J. Josefiak, and notified him that RAD was not fully satisfied with a written response submitted on behalf of the Committee in connection with a RFAI. For purposes of Notice 2011-11, we believe this date, February 9, constitutes the triggering notification to the Committee of a "determination by the Reports Analysis Division ... that a person or entity remains obligated to take corrective action to resolve an issue that has arisen during the report review ... process." Notice 2011-11, *Policy Statement Regarding a Program for Requesting Consideration of Legal Questions by the Commission*, 76 Fed. Reg. 45,798 (Aug. 1, 2011). This request is therefore submitted within the required 15-day time frame.

**Legal Question Presented**

This request relates to the proper disposition of funds raised and spent in connection with an anticipated special election that did not ultimately occur.

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<sup>1</sup> Michael Williams For U.S. Senate Committee changed its name to Michael Williams For Congress in June 2011.